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19	,	·
20	UNITED STATES	DISTRICT COURT
21	CENTRAL DISTRICT OF CALI	FORNIA – WESTERN DIVISION
22	In re: NAMCO CAPITAL GROUP,	Case No.: 2:11-cv-05320-GAF (CWx)
23	INC., a California corporation,	Chapter 11
	Debtor.	Bankr. Case No.: 2:08-bk-32333-BR
24		Adv. Proc. No.: 2:10-ap-02945-BR
25	BRADLEY D. SHARP, solely in his capacity as Chapter 11 Trustee of	EXHIBITS IN SUPPORT OF
26	NAMCO CAPITAL GROUP, INC.,	OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE
27	·	EVIDENCE RELATING TO
28		PROFESSIONAL FEES

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1 Plaintiff, 2 VS. 3 MOUSA NAMVAR et al., 4 Defendants. 5 6

[Filed with Defendants' Opposition; Declaration of Paul T. Dye; and Requests for Judicial Notice]

Hearing Date: October 21, 2013

Hearing Time: 9:30 a.m.

Hearing Place: Courtroom 740

Complaint Filed: October 26, 2010 Pretrial Conf.: September 23, 2013 Trial Date:

October 29, 2013

EXHIBITS IN SUPPORT OF DEFENDANTS' OPPOSITION

Defendants Lacy 20, LLC, Hooshang "Sean" Namvar, Homayoun "Tony" Namvar, Ramin Namvar, Trifish, LLC, Tribun, LLC, Believers, LLC, Net, LLC, Light Source Management, LLC and Woodman Partners, LLC joined by defendants Mousa Namvar, Magdiel, LLC, DGADE of Delaware, LLC, Namco 8, LLC, Bunherst, LLC and Wishlab 90, LLC, by and through their attorneys, hereby jointly and respectfully submit the following, attached exhibits in support of their Opposition to plaintiff Bradley D. Sharp's Motion in Limine to Exclude Evidence Relating to Professional Fees:

R. Todd Neilson's biographic profile from Berkeley Research Group, Exhibit 1: LLC's ("BRG") website. (See Requests for Judicial Notice ("RJN") $\P 1-2.)$

Exhibit 2: Neilson's curriculum vitae from BRG's website. (See RJN ¶1-2.)

Exhibit 3: Plaintiff's expert David H. Judd's biographic profile from BRG's website. (See RJN ¶¶3-4.)

1	Exhibit 4:	Plaintiff's Expert Witness Designation. (See Declaration of Paul T.
2		Dye ("Dye Decl.") ¶¶2-3.)
3		
4	Exhibit 5:	LECG, LLC's Final Fee Application (relevant portions). (See RJN
5		¶¶5-9.)
6		
7	Exhibit 6:	BRG's Third Fee Application (relevant portions). (See RJN ¶¶10-13.)
8		
9	Exhibit 7:	Plaintiff's biographic profile from Development Specialists, Inc.
10		("DSI") website. (See RJN ¶14.)
11		
12	Exhibit 8:	DSI's Third Fee Application (relevant portions). (See RJN ¶¶15-17.)
13		
14	Exhibit 9:	Judd's Expert Report. (See Dye Decl. ¶3.)
15		
16	Exhibit 10:	Plaintiff's August 5, 2013 Deposition Transcript (relevant portions).
17		(See Dye Decl. ¶4.)
18		
19	Exhibit 11:	Neilson's July 10, 2013 Deposition Transcript (relevant portions).
20		(See Dye Decl. ¶5.)
21	Tradellale 10.	Disintiffe Nisting of Discours on Applications of Chapter 11 Trustees
22	EXMIDIT 12:	Plaintiff's Notice of Hearing on Applications of Chapter 11 Trustees
23 24		and Professionals for Approval and Payment of Interim Compensation and Reimbursement of Expenses. (See RJN ¶18.)
25		and Remioursement of Expenses. (See RJN 10.)
26	///	
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1	Exhibit 13: Plaintiff's July 24, 2013	Deposition Transcript (relevant portions).
2	(See Dye Decl. ¶6.)	
3		
4	DATED: September 30, 2013	SALTZBURG, RAY & BERGMAN, LLP
5		D //D 1/11/D
6		By: <u>/s/ Paul T. Dye</u> Paul T. Dye
7		Attorneys for Defendants
8		Lacy 20, LLC, Hooshang Namvar,
9		Homayoun Namvar, Ramin Namvar, Trifish, LLC, Tribun, LLC, Believers, LLC,
10		Net, LLC, Light Source Management, LLC, and Woodman Partners, LLC
11 12		ŕ
13		
14	DATED: September 30, 2013	GREEN GLUSKER FIELDS CLAMAN & MACTINGER LLP
15		& MACTINGER LEI
16		By: <u>/s/ Bernard M. Resser</u>
17		Bernard M. Resser
18		
19		Attorneys for Defendants Mousa Namvar, Magdiel, LLC
20		DGADE of Delaware, LLC, Namco 8, LLC, Bunherst, LLC and Wishlab 90, LLC
21		Buillerst, LLC and Wishnab 90, LLC
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1	PROOF OF SERVICE			
2	Case No. 2:11-cv-05320-GAF (CWx)			
3	STATE OF CALIFORNIA) ss.			
4	COUNTY OF LOS ANGELES)			
5	I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 12121			
6	Wilshire Boulevard, Suite 600, Los Angeles, California 90025.			
7	On September 30, 2013, I caused the foregoing document(s) described as			
8	EXHIBITS IN SUPPORT OF OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE RELATING TO PROFESSIONAL			
9	FEES to be served on the interested parties in this action as follows:			
10	PLEASE SEE THE ATTACHED SERVICE LIST			
11	X VIA COURT'S NOTICE OF ELECTRONIC FILING			
12	Pursuant to L.R. 5-3 and 5-4, following ordinary business practices, I electronically filed the foregoing document(s) with the Clerk of the Court by using the Court's automated CM/ECF system. I checked the CM/ECF docket for this			
13				
14	case and determined that the person(s) indicated above are registered as CM/ECF			
15 16	Users who have consented to electronic service through the Notice of Electronic Filing transmission sent to the e-mail address(es) listed above.			
	X VIA PERSONAL DELIVERY			
17 18	In accordance with L.R. 5-4.5, the "mandatory chambers copy" of the foregoing document(s) will be delivered to:			
19	The Honorable Gary A. Fees			
20	U.S. District Court, Central District of California – Western Division Edward R. Roybal Federal Building and United States Courthouse			
21	255 E. Temple Street, Room 730			
22	Los Angeles, CA 90012-3332 (Placed in the courtesy copy box outside the entry door to chambers)			
23	X FEDERAL			
24	I declare under penalty of perjury under the laws of the United States of			
25	America that the above is true and correct. Executed on September 30, 2013, at			
26	Los Angeles, California.			
27	/s/ Aaron Rosenberg Aaron Rosenberg			
28	Auton Roschoolg			
-~				

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